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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA)
20 v.)
21 PAUL GRUDZIEN and)
22 MEGHAN GRUDZIEN,)
23 DEFENDANTS)
24)
25)
26)
27)
28)

No. CR 13-0059 EMC

**STIPULATION AND [PROPOSED]
ORDER CHANGING HEARING DATE
AND EXCLUDING TIME**



19 During the parties' appearance on February 1, 2013, the Court set March 20, 2013 as the
20 date for the initial appearance in front of the Honorable District Court Judge Edward M. Chen.
21 At that time, counsel requested that time between February 1, 2013 and March 20, 2013 be
22 excluded from any time limits applicable under 18 U.S.C. § 3161, for the purpose of effective
23 preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). At the hearing, the Court made
24 findings, and the parties agreed, that the ends of justice served by granting such an exclusion of
25 time outweighed the best interests of the public and the defendants in a speedy trial. 18 U.S.C. §
26 3161(h)(7)(A). The Court entered an order consistent with these findings on February 5, 2013.

27 The United States continues to produce discovery in this matter, and recently learned of a
28 scheduling conflict that will make the undersigned government counsel unable to attend the

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME
CR 13-0059 EMC

FILED
FEB 28 2013
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 previously scheduled initial appearance on March 20, 2013. In order to give counsel adequate
2 time to review discovery and prepare for the case, the parties request that the initial appearance
3 be moved from March 20, 2013 to April 17, 2013. The parties further request that time between
4 March 20, 2013 and April 17, 2013, be excluded from any time limits applicable under 18 U.S.C.
5 § 3161, for the purpose of effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

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8 SO STIPULATED:

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10 MELINDA HAAG
United States Attorney

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12 DATED: February 21, 2013

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14 /s/
15 ADAM L. WRIGHT
16 Assistant United States Attorney

17
18 DATED: February 21, 2013

19
20 /s/
21 RUSSELL GOODROW
22 Attorney for PAUL GRUDZIEN

23
24 DATED: February 21, 2013

25
26 /s/
27 ADAM G. GASNER
28 Attorney for MEGHAN GRUDZIEN

[PROPOSED] ORDER

2 For the reasons stated above, the Court finds that exclusion from the time limits
3 applicable under 18 U.S.C. § 3161 the period from March 20, 2013 to April 17, 2013 is
4 warranted and that the ends of justice served by the continuance outweigh the best interests of the
5 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the
6 requested exclusion of time would deny counsel for the defendant and for the government the
7 reasonable time necessary for effective preparation, taking into account the exercise of due
8 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 6/10/00

THE HONORABLE MARIA-ELENA JAMES
United States Magistrate Judge